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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**JOINT STIPULATION AND [PROPOSED]
ORDER REGARDING EXPEDITED
BRIEFING SCHEDULE AND HEARING
DATE FOR PLAINTIFFS' MOTION FOR
RELIEF FROM CASE MANAGEMENT
SCHEDULE**

Pursuant to Civil Local Rule 6-2, this joint stipulation is entered into between Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

WHEREAS, the Parties met and conferred but were unable to reach an agreement on modifications to the Case Management Schedule;

WHEREAS, on December 31, 2021, Plaintiffs filed their Motion for Relief from Case Management Schedule (the “Motion”), seeking an extension on the deadlines for the close of fact discovery and expert reports without modifying any other deadlines, Dkt. 371;

WHEREAS, the Motion has been noticed for a February 8, 2022 hearing;

WHEREAS, the close of fact discovery is currently scheduled for January 21, 2022;

WHEREAS, the Parties agree that an expedited briefing schedule and hearing date are necessary to resolve the Motion.

NOW THEREFORE, the Parties stipulate to the following expedited briefing schedule and jointly request a hearing date for the Motion.

1. The deadline for Google to file its opposition to Plaintiffs’ Motion for Relief from Case Management Schedule shall be January 11, 2022.
2. The deadline for Plaintiffs to file any Reply shall be January 14, 2022.
3. The Parties jointly request a hearing on Plaintiffs’ Motion for Relief from Case Management Schedule as soon as possible after January 14, at the Court’s convenience.

DATED: January 3, 2022

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Attorneys for Plaintiffs

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: January 3, 2022

By /s/ Amanda Bonn
Amanda Bonn
Counsel on behalf of Plaintiffs

[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

1. The deadline for Google to file its opposition to Plaintiffs' Motion for Relief from Case Management Schedule shall be January 11, 2022.
2. The deadline for Plaintiffs to file any Reply shall be January 14, 2022.
3. The hearing on Plaintiffs' Motion for Relief from Case Management Schedule is scheduled for _____.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____, 2022

Hon. Susan van Keulen
United States Magistrate Judge